

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

<p>ULTRAVISION TECHNOLOGIES, LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>GLUX VISUAL EFFECTS TECH (SHENZHEN) CO.,</p> <p>Defendant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. 2:18-cv-00099-JRG-RSP (LEAD CASE)</p> <p><u>JURY TRIAL DEMANDED</u></p>
<p>ULTRAVISION TECHNOLOGIES, LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>SAMSUNG ELECTRONICS CO., LTD.,</p> <p>Defendant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. 2:18-cv-00252-JRG-RSP (CONSOLIDATED CASE)</p> <p><u>JURY TRIAL DEMANDED</u></p>

**PLAINTIFF ULTRAVISION TECHNOLOGIES, LLC'S ANSWER
TO SAMSUNG ELECTRONICS' COUNTERCLAIMS**

Plaintiff/Counterclaim-Defendant Ultravision Technologies, LLC (Ultravision”), as and for its Answer to the Counterclaims of Defendant/Counterclaim-Plaintiff Samsung Electronics Co., Ltd., (“Samsung”), states as follows:

ANSWER TO COUNTERCLAIMS

Ultravision denies all allegations contained in headings preceding individually numbered paragraphs of Samsung's Counterclaims. Ultravision denies all allegations to the extent not expressly admitted. Ultravision hereby responds to the individually numbered paragraphs of Samsung's Counterclaims as follows:

NATURE OF THE ACTION

Ultravision admits that the Counterclaims purport to set forth a complaint for a declaratory judgment on non-infringement and invalidity arising under the Declaratory Judgment Act, 28 U.S.C. § 2201, et seq. Ultravision denies that Samsung Electronics is entitled to any such declaratory judgment.

PARTIES

1. Ultravision admits the allegations in paragraph 60 of the Counterclaims.
2. Ultravision admits the allegations in paragraph 61 of the Counterclaims.

FIRST COUNTERCLAIM

(Declaratory Judgment of Noninfringement of the '105 Patent)

3. Ultravision admits that paragraph 62 of the Counterclaims asserts that jurisdiction arises under the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202 and the laws of the United States concerning actions relating to patents, 28 U.S.C. § 1338(a); admits that a justiciable controversy exists between Ultravision and Samsung Electronics concerning its liability for infringement of the '105 Patent; and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

4. Ultravision admits that venue and personal jurisdiction are proper in this District and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

5. Ultravision denies the allegations in paragraph 64 of the Counterclaims except admits that Ultravision alleges that Samsung has made, sold, used, offered for sale, and/or imported into the U.S. products that infringe, directly or indirectly, at least claim 1 of the '105 Patent.

6. Ultravision denies the allegations in paragraph 65 of the Counterclaims.

SECOND COUNTERCLAIM
(Declaratory Judgment of Noninfringement of the '946 Patent)

7. Ultravision admits that paragraph 66 of the Counterclaims asserts that jurisdiction arises under the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202 and the laws of the United States concerning actions relating to patents, 28 U.S.C. § 1338(a); admits that a justiciable controversy exists between Ultravision and Samsung Electronics concerning its liability for infringement of the '946 Patent; and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

8. Ultravision admits that venue and personal jurisdiction are proper in this District and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

9. Ultravision denies the allegations in paragraph 68 of the Counterclaims except admits that Ultravision alleges that Samsung has made, sold, used, offered for sale, and/or imported into the U.S. products that infringe, directly or indirectly, at least claim 1 of the '946 Patent.

10. Ultravision denies the allegations in paragraph 69 of the Counterclaims.

THIRD COUNTERCLAIM
(Declaratory Judgment of Invalidity of the '105 Patent)

11. Ultravision admits that paragraph 70 of the Counterclaims asserts that jurisdiction arises under the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202 and the laws of the United States concerning actions relating to patents, 28 U.S.C. § 1338(a); admits that a justiciable controversy exists between Ultravision and Samsung Electronics concerning its liability for infringement of the '105 Patent; and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

12. Ultravision admits that venue and personal jurisdiction are proper in this District and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

13. Ultravision denies the allegations in paragraph 72 of the Counterclaims.

14. Ultravision denies the allegations in paragraph 73 of the Counterclaims.

FOURTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of the '946 Patent)

15. Ultravision admits that paragraph 74 of the Counterclaims asserts that jurisdiction arises under the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202 and the laws of the United States concerning actions relating to patents, 28 U.S.C. § 1338(a); admits that a justiciable controversy exists between Ultravision and Samsung Electronics concerning its liability for infringement of the '946 Patent; and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

16. Ultravision admits that venue and personal jurisdiction are proper in this District and avers that the remainder of this paragraph contains legal conclusions to which no responsive pleading is required.

17. Ultravision denies the allegations in paragraph 76 of the Counterclaims.

18. Ultravision denies the allegations in paragraph 77 of the Counterclaims.

ULTRAVISION'S PRAYER FOR RELIEF

WHEREFORE, Ultravision prays for the following relief against Samsung:

- A. Entry of Judgment dismissing Samsung's Counterclaims in their entirety;
- B. Entry of Judgment declaring the '105 and '946 Patents to be valid, enforceable, and infringed Samsung;

- C. An award of attorneys' fees and costs incurred in defending against Samsung's Counterclaims; and
- D. Such other and further relief as the Court deems just and proper.

JURY DEMAND

Ultravision demands a trial by jury.

Dated: July 27, 2020

Respectfully submitted

/s/ Alfred R. Fabricant

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**ATTORNEYS FOR PLAINTIFF
ULTRAVISION TECHNOLOGIES,
LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 27, 2020, a true and correct copy of the above and foregoing document has been served on counsel of record via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant
Alfred R. Fabricant